

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

STATE OF MISSOURI,
STATE OF GEORGIA,
STATE OF ALABAMA
STATE OF ARKANSAS,
STATE OF FLORIDA,
STATE OF NORTH DAKOTA, and
STATE OF OHIO

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION,

MIGUEL A. CARDONA, in his official
capacity as Secretary, United States
Department of Education, and

JOSEPH R. BIDEN, Jr., in his official
capacity as President of the United States,

Defendants.

Civil Action No. 2:24-cv-00103-LGW-BWC

MOTION TO SEAL CONTENTS OF EXHIBITS D AND F

Plaintiff States move for permission to seal the contents of Exhibits D and F until final judgment or Defendants consent to unsealing. *See* L.R. 79.7. These exhibits contain documents submitted by Defendants to MOHELA, which Plaintiff States obtained through compulsory legal process. Defendants marked these documents confidential, stating that these materials are “sensitive but unclassified information” and “includ[e] proprietary data, interpretations and/or derivatives of such data provided by the Federal Student Aid (FSA) Contracting Office and/or entities other than the contracting parties.” *See* Ex. D at 1. Plaintiff States move to seal this

information in an abundance of caution, recognizing that Defendants are in the best position to determine any consequences of unsealing.

Date: September 3, 2024

CHRISTOPHER M. CARR
Attorney General of Georgia

Stephen J. Petrany

Solicitor General

Office of the Attorney General

40 Capitol Square, SW

Atlanta, Georgia 30334

(404) 458-3408

spetrany@law.ga.gov

/s/ G. Todd Carter

G. Todd Carter, Esq.

Georgia Bar No: 113601

Special Assistant Attorney General

Office of the Georgia

Attorney General

Brown, Readdick, Bumgartner,

Carter, Strickland & Watkins, LLP

5 Glynn Avenue

P. O. Box 220

Brunswick, GA 31521-0220

Tel: 912-264-8544

Fax: 912-264-9667

tcarter@brbcs.com

Respectfully Submitted,

ANDREW BAILEY

Attorney General of Missouri

/s/ Joshua M. Divine

Joshua M. Divine*

Solicitor General

Reed C. Dempsey*

Deputy Solicitor General

Missouri Attorney General's Office

Post Office Box 899

Jefferson City, MO 65102

Tel. (573) 751-1800

Fax. (573) 751-0774

josh.divine@ago.mo.gov

reed.dempsey@ago.mo.gov

*Pro hac vice pending

STEVE MARSHALL
Attorney General of Alabama

/s/ Edmund G. LaCour Jr.

Edmund G. LaCour Jr.*

Solicitor General

Office of the Attorney General

State of Alabama

501 Washington Avenue

P.O. Box 300152

Montgomery, AL 36130-0152

(334) 242-7300

Edmund.LaCour@AlabamaAG.gov

*Pro hac vice pending

TIM GRIFFIN
Attorney General of Arkansas

/s/Nicholas Bronni

Nicholas J. Bronni*

Solicitor General

Dylan L. Jacobs*

Deputy Solicitor General

Office of the Arkansas Attorney General

323 Center Street, Suite 200

Little Rock, AR 72201

(501) 682-3661

Nicholas.Bronni@arkansasag.gov

Dylan.Jacobs@arkansasag.gov

*Pro hac vice pending

ASHLEY MOODY
Attorney General of Florida

/s/James H. Percival

James H. Percival*

Chief of Staff

Office of the Attorney General

The Capitol, Pl-01

Tallahassee, Florida 32399-1050

(850) 414-3300

(850) 410-2672 (fax)

james.percival@myfloridalegal.com

*Pro hac vice pending

DREW H. WRIGLEY
Attorney General of North Dakota

/s/ Philip Axt

Philip Axt*

Solicitor General

North Dakota Attorney General's Office

600 E. Boulevard Ave., Dept. 125

Bismarck, ND 58505

Telephone: (701) 328-2210

pjaxt@nd.gov

*Pro hac vice pending

DAVE YOST
Attorney General of Ohio

/s/ T. Elliot Gaiser

T. Elliot Gaiser*

Solicitor General

Mathura J. Sridharan*

Deputy Solicitor General

Office of the Attorney General

365 East Broad Street

Columbus, Ohio 43215

Phone: (614) 466-8980

thomas.gaiser@ohioago.gov

*Pro hac vice pending